



DON KIDD
President & C.E.O.
Chairman of the Board

Western Commerce Bank

Pulling together for you . . .

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Mr. John Carter
Regional Director FDIC
1776 F St., NW
Washington, DC 20006

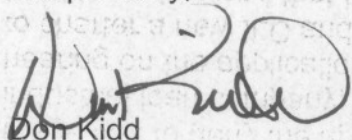
Dear Mr. Carter:

I urge you to deny the application of Home Depot, Inc. to acquire a Utah industrial loan company, EnerBank, and request that the FDIC hold a public hearing on the application. This application is similar to the attempt by Wal-Mart to charter a new ILC and raises the same critical public policy concerns. It is not hard to understand that Home Depot's intent is to organize a nation wide deposit accumulation network.

This combination could also pose an unfair threat to local lenders that lack a direct tie to a commercial parent. Local banks will lose business currently being provided by local contractors.

The hail storm of applications for industrial loan company charters is reminiscent of the Comptroller of the Currency's decision in the 70's to charter banks with minimum capitalization. Without considering whether an institution was needed in that community. This lead to brokered CD's and the S & L Crisis of the 80's. Organizations like Home Depot can certainly afford the attorney's and PR companies that can prove the fall of the United States will occur unless they are able to gather insured deposits. I think Congress and the Federal Reserve understood the necessity of separating commerce and banking in the 1930's. As with a lot of other things, so soon we forget.

Respectfully,


Don Kidd